

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC. and SAMSUNG ELECTRONICS CO.,
LTD.

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY TRIAL DEMANDED

JOINT STIPULATION REGARDING CASE NARROWING

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) file this Joint Notice Regarding Case Narrowing and stipulate as follows:

21 days before opening expert reports	<p>Election of Asserted Claims</p> <p>Plaintiff shall serve an Election of Asserted Claims, identifying no more than 10 claims per asserted patent, for a total of no more than 25 claims across the three asserted patents.</p>
Deadline for opening expert reports	<p>Election of Prior Art</p> <p>Defendants shall serve an Election of Prior Art, identifying no more than 12 prior art references¹ against each asserted patent.</p>

¹For purposes of this Order, a prior art instrumentality (such as a device or process) and associated references that describe that instrumentality shall count as one reference, as shall the closely related work of a single prior artist.

Dated: July 22, 2024

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements of Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

By /s/ Jonathan B. Bright
Jonathan B. Bright

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 22, 2024

/s/ Jonathan B. Bright
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